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December 12, 2000

VIA COURIER

Magalie Roman Salas, Esquire  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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DEC 12 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Attention: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

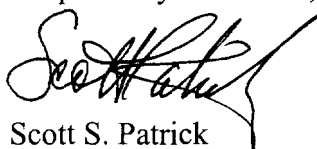
Re: KCBD-DT, Lubbock, Texas  
Facility ID No. 27507  
Supplement to Petition to Amend the DTV Table of Allotments

Dear Ms. Salas:

On behalf of Cosmos Broadcasting Corporation, licensee of KCBD-TV, Lubbock, Texas, and at the request of the Commission's Staff, there are transmitted herewith an original and five copies of a supplement to its *Petition for Rule Making*, submitted April 11, 2000, proposing a substitution of channel 9 for channel 43 as the station's paired DTV allocation. The supplement states that the proposed channel change is not known to impact any prospective Class A stations.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,

  
Scott S. Patrick

Enclosure

cc(w/): Ms. Nazifa Naim (FCC; Courier Delivered Stamp-and-Return copy)

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of  
  
Amendment of Section 73.622(b)  
Table of Allotments,  
Digital Television Broadcast Stations  
(Lubbock, Texas)

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MM Docket No. \_\_\_\_\_  
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To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

**SUPPLEMENT TO COSMOS BROADCASTING CORPORATION'S  
PETITION FOR RULE MAKING  
TO AMEND THE DTV TABLE OF ALLOTMENTS**

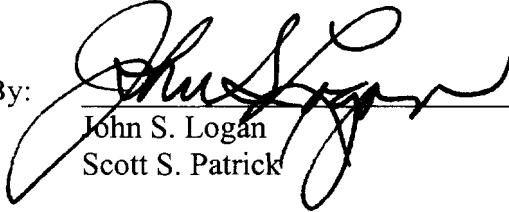
Cosmos Broadcasting Corporation ("Cosmos"), licensee of KCBD-TV, Lubbock, Texas, by its attorneys and pursuant to the request of the Commission's Staff, hereby submits the attached Engineering Statement to supplement its petition to institute a rulemaking to amend Section 73.622(b), the DTV Table of Allotments, by substituting channel 9 as the station's paired DTV allocation for the transition period in lieu of channel 43, as originally allotted. As indicated in the Technical Statement, the proposed facilities would not adversely impact any eligible and known prospective Class A station. By submitting this supplement, Cosmos is not conceding that it is required to protect an impacted Class A station in these circumstances.

WHEREFORE, for the reasons previously described in its Petition for Rule Making, Cosmos respectfully reiterates its request that the Commission initiate a rule making proceeding

to amend Section 73.622(b) of its Rules to substitute channel 9 for channel 43 for use by KCBD-DT at the allotted reference point in Lubbock, Texas.

Respectfully Submitted,

COSMOS BROADCASTING CORPORATION

By:   
John S. Logan  
Scott S. Patrick  
Its Attorneys

Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Avenue, N.W.  
Suite 800  
Washington, D.C. 20036-6802  
202-776-2000

Dated: December 12, 2000

**ATTACHMENT**

**Technical Statement**

TECHNICAL SUPPLEMENT  
CLASS A INTERFERENCE ANALYSIS  
TO SUPPORT THE  
PETITION FOR RULE MAKING TO  
MODIFY THE DTV ALLOTMENT TABLE  
STATION KCBD-DT  
LUBBOCK, TEXAS

Technical Statement

This Technical Supplement was prepared on behalf of KCBD-DT in support of the pending *Petition for Rule Making* to modify the DTV allotment of KCBD-DT from channel 43 to channel 9.

An FCC staff member has requested this analysis of the impact to Class A television stations from the proposed DTV Channel 9 allotment at Lubbock, Texas. Therefore, this supplement was prepared and submitted.

As discussed below, the proposed Lubbock DTV 9 facility does not cause any prohibited contour overlap to any existing Low Power Television (LPTV) station with an FCC accepted Class A eligibility certification.

For the analysis, all the authorized and licensed LPTV stations within 500 kilometers on Channel 9 (co-channel) and 300 kilometers on the adjacent channels were tabulated.<sup>1</sup> This tabulation is provided below. Each station was then analyzed to determine if the Class A eligibility certification was accepted Commission. As shown on the below tabulation, none of these LPTV stations

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<sup>1</sup> The study radius of 500 kilometers for co-channel and 300 kilometers for adjacent-channel stations is a sufficient distance to study the necessary low powered television stations. The Commission's CDBS was employed searching only current records.

requested Class A status and therefore, no protection is required.

LPTV Stations within proposed Channel 9 Lubbock DTV 300 kilometers for adjacent channels (channels 8,10) 500 kilometers for co-channel (channel 9)		
Low Power Television Station	Facilities	Distance from Proposed Channel 9 at Lubbock (km)
K10HH Big Spring, TX	Channel 10 0.074 Kw	151
<i>Station did not file Statement of Class A Eligibility.</i>		
K09IA Conchas Dam, NM	Channel 9 0.014 kW	291
<i>Station did not file Statement of Class A Eligibility.</i>		
K09KC Santa Rosa, NM	Channel 9 0.009 kW	299
<i>Station did not file Statement of Class A Eligibility.</i>		
K09AW Roy, NM	Channel 9 0.011 kW	354
<i>Station did not file Statement of Class A Eligibility.</i>		
K09CR Wagon Mount, NM	Channel 9 0.028 kW	376
<i>Station did not file Statement of Class A Eligibility.</i>		
K09AI Las Vegas, NM	Channel 9 0.02 kW	382
<i>Station did not file Statement of Class A Eligibility.</i>		
K09DZ Mora, NM	Channel 9 0.007 kW	419
<i>Station did not file Statement of Class A Eligibility.</i>		
K09LQ Guadalupita, NM	Channel 9 0.002 kW	421
<i>Station did not file Statement of Class A Eligibility.</i>		
K09FV Orofino, ID	Channel 9 0.02 kW	422
<i>Station did not file Statement of Class A Eligibility.</i>		
K09AK Eagle Nest, NM	Channel 9 0.009 kW	462
<i>Station did not file Statement of Class A Eligibility.</i>		
K09HU Hoehne, CO	Channel 9 0.003 kW	464
<i>Station did not file Statement of Class A Eligibility.</i>		
K09IY Vermejo Park, NM	Channel 9 0.009 kW	469
<i>Station did not file Statement of Class A Eligibility.</i>		

LPTV Stations within proposed Channel 9 Lubbock DTV 300 kilometers for adjacent channels (channels 8,10) 500 kilometers for co-channel (channel 9)		
Low Power Television Station	Facilities	Distance from Proposed Channel 9 at Lubbock (km)
K09LN Rinconada, NM	Channel 9 0.04 kW	475
<i>Station did not file Statement of Class A Eligibility.</i>		

Conclusion

The proposed Lubbock DTV Channel 9 will not cause predicted interference to any low power television station having a Class A eligibility statement accepted by the Commission.



Charles Cooper

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November 20, 2000